

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:
SIMO HOLDINGS INC.,	:
	:
Plaintiff,	: No. 1:18-cv-05427 (JSR)
	:
-against-	:
	:
HONG KONG UCLOUDLINK NETWORK	:
TECHNOLOGY LIMITED and	:
UCLOUDLINK (AMERICA), LTD.,	:
	:
Defendants.	:
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**DECLARATION OF BRADFORD A. CANGRO IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFF'S
MEMORANDUM OF LAW IN SUPPORT OF ITS MOTIONS *IN LIMINE***

I, Bradford A. Cangro, declare as follows:

1. I am an associate at Morgan, Lewis & Bockius LLP and am an attorney of record in the above-captioned action for Defendants Hong Kong uCloudlink Network Technology Limited and Ucloudlink (America), Ltd. (collectively “uCloudlink”). I make this declaration in support of uCloudlink’s memorandum of law in opposition to Plaintiff’s Motions *in Limine*. The matters stated herein are based upon my personal knowledge, and, if called as a witness, I could and would competently testify to them.

2. Attached as Exhibit A are true and correct excerpts of the November 7, 2018 deposition transcript of Eric Plam.

3. Attached as Exhibit B are true and correct excerpts of the November 7, 2018 deposition transcript of Jing Liu.

4. Attached as Exhibit C are true and correct excerpts of the November 5, 2018 deposition transcript of Xiaolei Qin.

5. Attached as Exhibit D are true and correct excerpts of the Expert Report of Dr. Martin J. Feuerstein dated January 14, 2019.

6. Attached as Exhibit E are true and correct excerpts of the Expert Report of Christopher A. Martinez dated January 14, 2019.

7. Attached as Exhibit F are true and correct excerpts of the Expert Report of John L. Hansen dated February 2, 2019.

8. Attached as Exhibit G are true and correct copy of 2018 American Intellectual Property Law Association Model Patent Jury Instructions.

9. Attached as Exhibit H are true and correct excerpts of the November 8, 2018 deposition transcript of Rongrong Zeng.

10. Attached as Exhibit I are true and correct excerpts of the November 6, 2018 deposition transcript of Hua Wei.

11. Attached as Exhibit J are true and correct excerpts of the Rebuttal Expert Report of Paul C. Clark dated February 14, 2019.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 24th day of April 2019, at New York, New York.

/s/ Bradford A. Cangro

Bradford A. Cangro